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Class Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919-CW

**DECLARATION OF NICHOLAS SOLOMON
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION
EXPENSES, AND SERVICE AWARDS FOR
CLASS REPRESENTATIVES**

Hrg. Date: April 7, 2025
Time: 10:00 a.m.
Judge: Hon. Claudia Wilken
Courtroom: 2, 4th Floor

1 I, NICHOLAS SOLOMON, declare as follows:

2 1. I am one of the named plaintiffs in the above-entitled action. I have personal knowledge
3 of the facts stated in this declaration and, if called as a witness, I could and would testify competently
4 to them. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement
5 of Litigation Expenses, and Service Awards for Class Representatives.

6 2. I became involved in this litigation in early September 2024, before the third
7 consolidated amended complaint was filed. I joined this litigation because I felt it was the right thing
8 to do. What I could receive personally from the case has never been my motivation for serving as a
9 class representative and pursuing claims on behalf of current and former college athletes. Although
10 my own losses in this case are small when compared to the overall settlement, I believe in this case
11 and have been dedicated in putting my time and energy to benefit the classes and all college athletes.

12 3. I understood from the outset that participating in this lawsuit as a class representative
13 would not necessarily provide a significant financial benefit to me. I also knew that there was no
14 guarantee I would personally receive any more from my involvement beyond what other class
15 members may receive, and that I could receive nothing if the proposed settlement is not approved and
16 my attorneys and I are unsuccessful in this litigation, in which case the time and energy that I devoted
17 to the case would not result in any financial recovery whatsoever.

18 4. Since becoming involved in this litigation, I have actively and diligently performed my
19 duty to assist counsel in prosecuting and settling this case, investing significant time and effort to fulfill
20 my role as a class representative. Among other things, I have devoted significant time to:

- 21 • Reviewing the complaints filed in this litigation, including the third amended
22 complaint before it was filed;
- 23 • Regularly communicating with Class Counsel regarding the status and progress of the
24 case;
- 25 • Reviewing important litigation briefs and Court orders;
- 26 • Consulting with Class Counsel regarding the settlement;
- 27 • Reviewing the settlement that was submitted for preliminary approval and the
28 amendments to the settlement before the revised settlement was submitted for
preliminary approval; and

- Consulting with my attorneys throughout the settlement approval process to ensure the class will achieve a fair outcome.

5. Throughout my involvement in this litigation, I have had conversations with Class Counsel by video, and have exchanged emails about relevant facts, strategy, and case updates.

6. At the time I joined this litigation, I had concluded my career playing Division I lacrosse and football at the University of North Carolina, and Division I lacrosse at Georgetown University, but remained, and still remain, active in the North Carolina and Georgetown athletics communities and in frequent contact with my former teammates and coaches. Given Defendants' immense power and influence in athletics, I placed my college sports relationships and friendships at risk through my involvement in this case.

7. Still today, with the proposed settlement pending, and the substantial media attention surrounding it, my name has been mentioned in news articles and commentaries about the settlement, and I am often contacted about the case by class members, and others in and around college sports.

8. Finally, I support final approval of the settlement in this matter. I understand that the Court granted preliminary approval of it, and that the Court will hold a final approval hearing on April 7, 2025, per the current schedule. I am proud to have been a named plaintiff and played a meaningful role in this litigation that has achieved a significant recovery for the classes and will greatly benefit former, current, and future college athletes.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14th day of December, 2024 at New York, New York.

Nicholas Solomon

NICHOLAS SOLOMON